

EXHIBIT A

STATE OF NORTH CAROLINA

FILED

COUNTY OF MECKLENBURG

NADA FELDMAN,

Plaintiff,

vs.

CVS PHARMACY, INC

Defendant.

GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

22-CVS- 13129

2022 AUG 10 A 10 42

MECKLENBURG CO.. C.S.C

BY

COMPLAINT

NOW COMES Plaintiff, complaining of Defendant, and alleges as follows:

1. Plaintiff is a citizen and resident of Mecklenburg County, North Carolina.
2. Defendant is a foreign entity authorized to do business in the State of North Carolina.

Factual Background

3. This lawsuit arises out of an injury caused by an unsafe condition that occurred on June 23, 2022 on premises owned and/or maintained by Defendant located at 19305 W. Catawba Rd in Huntersville, NC. (hereinafter "Premises").

4. On June 23, 2022, Plaintiff was on Defendant's Premises as a guest when she tripped over an improperly stored moving platform ("Platform").

5. Defendant owned and maintained the Platform at the time of Plaintiff's injury as alleged herein.

6. Defendant, acting by and through its employees, stored the Platform on the side of one of its shopping aisles, where it posed a tripping hazard.

7. Plaintiff tripped over the Platform and hit the ground.

8. She sustained serious physical injuries from the fall.

9. Plaintiff's damages exceed \$25,000, and include but are not limited to damages for medical expenses (past and future), pain and suffering (past and future), lost wages, physical impairment (past and future), and permanent injury.

Claim for Negligence against Defendant

10. Plaintiff realleges paragraphs 1-9 in support of this claim.

11. Defendant was negligent as follows:

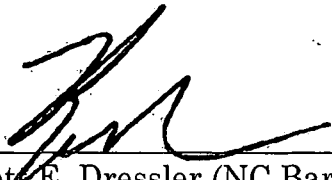
- (a) Improperly storing the Platform so as to create a tripping hazard
- (b) Failing to warn Plaintiff of the Platform as a tripping hazard
- (c) In such other ways as to be disclosed during the discovery process

As a direct and proximate result of the negligent acts of Defendant, Plaintiff has been damaged in an amount in excess of \$25,000 as alleged in paragraph 9.

WHEREFORE, Plaintiff prays that:

- 1. She have and recover compensatory damages, interest and court costs from Defendant;
- 2. She have a trial on issues so triable;
- 3. She have such other and further relief as to the Court may seem just and proper.

This, the 10th day of August, 2022.



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